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**COMMENTS TO PROCEEDING # 99-25
NPRM on Low Power, Microradio Broadcasting**

For a short, bottom-line comment to the NPRM on Low Power, Microradio Broadcasting, Proceeding # 99-25, please show me in favor of creating this class of broadcasting on the FM frequencies.

I agree with numerous commenters that the FCC should authorize the creation of LPFM broadcasting, specifically the LP1000 and LP100 stations. Further, I support creation of a microradio broadcasting authorization in the 1 to 10 watt power output as well. As your other comments have shown, there is a demand for alternatives to the large commercial broadcasters on the FM frequencies.

Large corporations continue to own and acquire additional commercial radio outlets, and broadcast only the types of programming that are "commercially viable." Although there are some "public service" announcement opportunities, these are generally of the ten to thirty second nature, and invariably are broadcast in the wee hours of the morning when the audience is at its smallest. Realistically, options for alternative broadcasting to communities, sub-divisions and other concentrated localities and groups is out of reach for the average person or organization. The authorization of LPFM broadcasting in the order of LP1000 and LP100 stations could address the issue of concentrated ownership and high entry costs, allowing small groups and individuals to setup and maintain access to the airwaves.

In addition to the two classes (LP1000 and LP100) proposed by the FCC, I also vigorously support the idea of also having a "Microradio" authorization for stations with 1 to 10 watts of power, broadcasting as a secondary service behind the two proposed. This could allow a person or organization (such as a neighborhood watch, property owners association, or non-profit organization, etc.) to establish a relatively inexpensive radio station to broadcast to a small neighborhood or subdivision. Programming might be as diverse as public affairs relating to the neighborhood, special events within the neighborhood, organizational meetings broadcast to the public, etc.

I believe that each of the classes proposed should be considered to be established as non-commercial radio stations. Their primary operation should be self-funded if at all possible, but allowing some limited commercial messages at some cost would also ensure that higher operating costs can be defrayed, especially among LP1000 stations. Perhaps donations and self-generated funding would suffice for Microradio stations, but prohibiting commercial revenues may work against the purpose of establishing a low budget operation. The less regulation the better as far as I can determine.

There is (predictably) much opposition from commercial (high power) FM radio broadcasters. They claim that possible interference from low power stations will degrade the reception of their

powerful signals. Your technical engineers know that this is an excuse at best, since FM signals are subject to the “capture effect” whereby the strongest FM signal in the area is the only one detected by the receiver. For a Low Power broadcaster to interfere with a high power commercial station, the listener would have to be located at the extreme fringe area of the commercial station’s broadcast limits. There, both signals might have the same strength and cause either station to be received, or both of them to “fight” each other for reception. This is nothing new – it happens today in those fringe areas, and it is not the problem they would have you believe.

If adoption of a Microradio service is approved, I agree with the FCC position that it would not be overly burdensome on the operator to submit the transmitter for certification and periodic inspection. Perhaps crystal controlled operation could be considered if there is any concern for out-of-frequency operational problems. Possible interference with the aviation bands from non-compliant transmitters makes it acceptable to me for transmitter certification requirements. I also believe that there should not be any restriction on the use of translators for station-to-antenna broadcast within reason. This is allowed for today’s broadcast stations. Distance requirements as calculated by the FCC could limit the possibilities for interference among the different FM classes, and would limit the number of stations operating on the same frequency in a given area.

The FCC seeks comments on a possibility of using reduced bandwidth (100 Khz instead of 200 Khz) to reduce interference and allow more stations in operation. I DO NOT support this proposal because of the implied changes to equipment that it would entail. Narrow band equipment would have to be designed, marketed and purchased by both broadcaster and receiver, and the cost would probably be high as it would be a “niche” market for sometime to come. In a similar thought, the FCC has already noted that it would not create a different frequency allocation for that same reason. This narrow band proposal defeats the purpose of simple and inexpensive access to the band.

I agree with FCC comments that these low power stations would not be permitted to be licensed to large commercial radio interests. Local ownership and operation is the vision of the many person who have petitioned the FCC for access to the bands for alternative broadcasting. We don’t need more of the same commercial broadcast formats which do not serve the local interest of individuals and organizations seeking inexpensive and easy access to radio broadcasting. Similarly, I do not believe that there should be any over-regulation of the formats, content, local origination requirements, hours of operation, log-keeping, etc. Community “Standards of Decency” should guide the station’s operation. The operator should be responsible for proper technical operation. I am not against regulation per-se, but rather want to guard against regulation where it is not needed.

I would support a call-sign system of some type that could identify the station as a low power broadcaster. Stations broadcasting to the public in other radio services have station identification requirements. This should not be burdensome for the proposed radio class.

In summary, these are my comments on the proposal to establish a Low Power FM and Microradio Broadcasting service. As noted in the comments above, I fully support the ideas with the few modifications I have noted in the above.

Thank you for your consideration.

S/
Timothy Cramer

